

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOVAN VAVIC,

Defendant.

CRIMINAL NO.: 19-CR-10081-IT

**ASSENTED TO MOTION TO CONTINUE THE DEADLINE TO FILE OBJECTIONS
TO THE PRESENTENCE REPORT AND SENTENCING HEARING DATE**

Jovan Vavic, through undersigned counsel, respectfully moves for an order continuing the deadline to file objections to his presentence report to July 13, 2022. As grounds for the motion, Vavic states that the objections to Vavic's presentence report are currently due on Wednesday, June 29, 2022, the same day as oral argument on his Motion for Judgment of Acquittal or in the Alternative, for a New Trial. Given the travel and preparation required for the hearing and on the objections, counsel will require additional time to prepare the objections.

Counsel has conferred with the U.S. Probation Officer, who has informed us that she will require a corresponding continuance of the sentencing hearing of at least the same length.

Counsel has also conferred with the Government and the Courtroom Clerk. The Government assents to the requested relief, provided the defense agrees on a date in early September for any sentencing (given the Courtroom Clerk's indication that the Court will not be available on the alternative August dates proposed by the defense, August 10 or August 17, in light of a trial). Defense counsel is available for sentencing after September 8, 2022.

WHEREFORE, the parties respectfully request that the Court grant this motion to continue the deadline to file objections to Vavic's presentence report to July 13, 2022, and

continue any sentencing hearing to a date to be determined by the Court.

Dated: June 27, 2022

Respectfully submitted,

/s/ Koren L. Bell

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Koren L. Bell

Koren L. Bell